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To: [Coffin Butte Landfill Appeals](#)
Subject: Testimony in opposition to LU-24-027
Date: Sunday, October 19, 2025 7:10:46 PM

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I am writing to oppose the expansion of the Coffin Butte Landfill, File # LU-24-027, which has already been unanimously denied by the Planning Commission and recently appealed to the Benton County Board of Commissioners.

I read the staff recommendation with interest, noting the use by Applicant and Staff of words like “conjecture”, “speculation”, and “fear” to dismiss and diminish environmental concerns. During my 30 year career as an insurance actuary, I have evaluated many kinds of risks, including environmental risks. These risks are neither speculation nor conjecture, but can be evaluated using existing actuarial standards of practice. The costs of landfill clean-up are very high, reaching 100’s of millions of dollars, yet the Applicant currently holds an environmental reserve of under \$20 million (per their 2023 annual report) and their environmental liability insurance is also inadequate to address more than a limited event. Such liability insurance is quite expensive, since the insurance market recognizes and measures these very real risks.

The history of the Coffin Butte Landfill is also indicative of the environmental risk that would be increased via the expansion. Despite the control activities exercised by the property managers, there are regular methane emission events; large volumes of leachate being routed into the local waterways; the occasional fire; windblown debris on our roadways; and the acceptance of waste categories with hazardous characteristics.

If the Board were to approve the expansion, Benton County taxpayers and residents would very likely bear the burden of the increased environmental risk and eventual future cost of clean-up. The fees now being paid (and proposed to be paid) are insufficient compensation for this risk transfer to the County.

Benton County does not need the landfill to expand in order to serve Benton County’s interests. We do not need to increase our exposure to environmental risks to our air quality, groundwater, wildlife, and health and security of our residents. I respectfully urge the Commissioners to agree with the unanimous decision of the Planning Commission to deny the Applicants request for a permit.

With regards,

Daniel DeKeizer

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